

CRAIG A. BARBAROSH (SBN 160224)
 craig.barbarosh@kattenlaw.com
 JESSICA M. MICKELSEN (SBN 277581)
 jessica.mickelsen@kattenlaw.com
KATTEN MUCHIN ROSENMAN LLP
 650 Town Center Drive, Suite 700
 Costa Mesa, CA 92626-7122
 Telephone: (714) 966-6819
 Fax: (714) 966-6821

Attorneys for Secured Creditor
 WELLS FARGO BANK, N.A.

UNITED STATES BANKRUPTCY COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

In re:	Case No. 14-10588-b-11
J & D WILSON AND SONS DAIRY,	Chapter 11
Debtor-In-Possession.	DC No.: UST-1

**LIMITED JOINDER TO DEBTOR'S
 OPPOSITION TO UNITED STATES
 TRUSTEE'S MOTION TO DISMISS CASE
 PURSUANT TO 11 U.S.C. § 1112(b)**

Date: September 11, 2014
 Time: 9:00 a.m.
 Place: United States Bankruptcy Court
 2500 Tulare Street, Fifth Floor
 Department B, Courtroom 12
 Fresno, California
 Judge: Honorable W. Richard Lee

Secured creditor Wells Fargo Bank, N.A. ("Wells Fargo") files this limited joinder to Debtor's opposition to the motion of the United States Trustee ("Trustee") to dismiss the case of the above-captioned debtor J & D Wilson and Sons Dairy ("Debtor") pursuant to 11 U.S.C. § 1112(b) ("Motion"). In light of recent developments, Wells Fargo would support denial of the Motion at this time, without prejudice, or a continuance of a hearing on the Motion to provide the Debtor with additional time to memorialize terms of a consensual plan to the satisfaction of all parties.

Since the hearing on the Debtor's motion to assume certain leases with C.A. Vanderham & Sons Dairy, and the filing of this Motion, the Debtor and Wells Fargo have engaged in further negotiations to work out terms of a consensual plan. These negotiations have been productive, and

Katten
 KattenMuchinRosenman LLP
 2029 Century Park East, Suite 2600
 Los Angeles, CA 90067-3012
 310.788.4400 tel 310.788.4471 fax

1 the Debtor and Wells Fargo recently reached agreement on terms for a restructure of the obligations
 2 that the Debtor owes to Wells Fargo. These terms are presently being memorialized in a consensual
 3 plan (and will be subject to final documentation satisfactory to Wells Fargo). Given this progress,
 4 Wells Fargo is hopeful that the Debtor will soon file a plan that embodies the agreed upon terms and
 5 that the Debtor will be able to obtain confirmation of this consensual plan in short order.

6 Wells Fargo recognizes that this case has been pending for a long time. However, Wells
 7 Fargo believes that the recent developments in this case and the Debtor's agreement to the terms of a
 8 restructure with Wells Fargo will result in a confirmable plan. Wells Fargo would, therefore,
 9 support denial of the Motion, without prejudice, or a continuance of the hearing on the Motion to
 10 provide the necessary time to memorialize terms and file and confirm the plan that all parties can
 11 support.

12
 13 Dated: September 4, 2014

KATTEN MUCHIN ROSENMAN LLP
 Craig A. Barbarosh
 Jessica M. Mickelsen

15 By: /s/Jessica M. Mickelsen
 Attorneys for Secured Creditor
 16 WELLS FARGO BANK, N.A.
 17
 18
 19
 20
 21
 22
 23
 24
 25
 26
 27
 28